



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

December 22, 2021

BY ECF

The Honorable George B. Daniels
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: **United States v. Mendel Zilberberg and Aron Fried,**
19 Cr. 802 (GBD)

Dear Judge Daniels:

The parties in the above-referenced case jointly write to request a short adjournment of the trial currently scheduled for March 21, 2022. As set forth in the Government's letter dated December 15, 2021 (ECF No. 64), the Government understands that this case has been assigned to a second-priority trial date of March 21, 2022. One of the undersigned AUSAs, AUSA Sagar Ravi, is also the AUSA handling the separate case that is scheduled as the first-priority trial for the same trial date of March 21, 2022. Because the trial in the other case is expected to go forward, and in order to avoid unnecessary trial preparation during the ongoing COVID-19 pandemic, the parties jointly request a short adjournment of the trial date until May 9 or May 16, 2022, or alternatively, another date in May 2022 that is convenient for the Court. The parties also respectfully request that the Court set a new pretrial conference date 30 days prior to the new trial date, as well as a date for motions *in limine* to be filed 30 days prior to the pretrial conference.

Finally, the Government respectfully requests that time be excluded under the Speedy Trial Act until the new trial date, pursuant to Title 18, United States Code, Section 3161(h)(7)(A). The Government submits that the exclusion of time best serves the ends of justice and outweighs the best interests of the public and the defendants in a speedy trial as it will enable the parties to continue discussions regarding a potential pretrial disposition of this matter and preparation for trial. Counsel for both defendants, Mendel Zilberberg and Aron Fried, consent to this request.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: 

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